

EXHIBIT A

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

UNITED STATES, *et al.*,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

No. 1:23-cv-00108-LMB-JFA

DECLARATION OF EUGENIE C. GAVENCHAK

I, Eugenie C. Gavenchak, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am Senior Vice President and Deputy General Counsel at News Corporation, located in New York, New York. Among other duties, I oversee litigation involving News Corp.

2. In connection with my duties, I have personal knowledge of the contents of and circumstances surrounding the News Corp documents attached as exhibits to Google's Opposition to the United States' Motion for Partial Judgment on the Pleadings, Dkt. No. 369, including Exhibits 10, 11, 12, and 13. In preparing this declaration, I reviewed those documents and spoke with News Corp employees familiar with the circumstances surrounding their creation and how disclosure of those documents would impact News Corp's business.

3. I understand that the documents at issue have not previously been made publicly available.

4. Paul, Weiss, Rifkind, Wharton & Garrison represented News Corp in responding to a Civil Investigative Demand issued by DOJ in 2020 as part of DOJ's investigation of Google's ad tech conduct. Paul Weiss collected News Corp documents and produced those documents to DOJ. Those submissions included at least Exhibits 10, 11, and 12. Paul Weiss

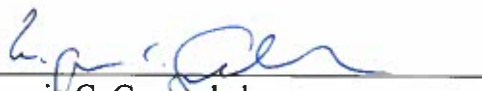
recognized the commercial sensitivity of these submissions and requested confidential treatment of these documents.

5. Publicity surrounding or disclosure of the documents attached to Google's opposition as Exhibits 10, 11, 12, or 13 will cause News Corp significant commercial and competitive harm. Similarly, disclosure of quoted material from these documents in Google's opposition will cause News Corp significant commercial and competition harm.

6. The harm to News Corp commercial and competitive interests does not have a near-term expiration date and cannot be prevented by more tailored redactions.

Executed on September 7, 2023

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.


Eugenie C. Gavenchak